



January 26, 2024

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VIA ECF

The Honorable Gregory B. Williams
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26
Room 6124
Wilmington, DE 19801-3555

Re: *Ameritas Life Insurance Corp. v. Wilmington Savings Fund Society, FSB*
C.A. No.: 23-236-GBW

Dear Judge Williams:

Non-party Cozen O'Connor, which is serving as counsel for Plaintiff Ameritas Life Insurance Corp. ("Ameritas") in the above-referenced matter, and Defendant/Counter-Claimant Wilmington Savings Fund Society ("WSFS") write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on January 17, 2024:

Delaware Counsel for non-party Cozen O'Connor: Kaan Ekiner
Lead Counsel for non-party Cozen O'Connor: Barry Golob

Delaware Counsel for WSFS: Steven L. Caponi
Lead Counsel for WSFS: Aaron M. Rubin

The disputes requiring judicial attention are listed below:

Non-party Cozen O'Connor seeks a protective order and/or to quash WSFS's Rule 45 subpoena dated December 6, 2023 (D.I. 44).

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Kaan Ekiner (#5607)

CC: ALL COUNSEL OF RECORD (VIA CM/ECF)

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